

THE HONORABLE \_\_\_\_\_

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

THE POKÉMON COMPANY  
INTERNATIONAL, INC. a Delaware  
corporation,

Plaintiff,

v.

JANE/JOHN DOES 1–3,

Defendants.

No. 2:19-cv-1911

DECLARATION OF HOLLY M.  
SIMPKINS IN SUPPORT OF PLAINTIFF’S  
EX PARTE MOTION FOR EXPEDITED  
DISCOVERY

I, Holly M. Simpkins, declare as follows:

1. I am an attorney licensed to practice law before the courts of the State of Washington. I am a Partner at Perkins Coie LLP, and counsel in this action for Plaintiff The Pokémon Company International, Inc. (“TPCi”). I submit this declaration in support of TPCi’s Ex Parte Motion for Expedited Discovery. I have personal knowledge of the facts stated herein and, if called upon, could and would testify competently thereto under oath.

2. The websites and internet forums Defendants used to leak the images of the Pokémon Sword and Pokémon Shield Strategy Guide (the “Strategy Guide”) were investigated at my direction.

1           3. Searches were performed to identify the online locations where the leaked images  
2 were posted. This process identified over 300 unique URLs. Takedown requests were sent to  
3 the platforms that hosted this content.

4           4. In addition to legal counsel, TPCi hired outside forensic investigators to assist in  
5 its search for the source of the leaks.

6           5. Multiple online locations were searched including the r/SwShLeaks subreddit,  
7 4chan and Discord. This included, among other things, analyzing the comments for multiple  
8 posts, analyzing posts from the individuals posting the photographs, and investigating other posts  
9 discussing the leaks. No name, email address, or location for the individual who took the  
10 original photographs was found.

11           6. Attached as Exhibit 1 is a true and correct copy of a screenshot captured from  
12 4chan. Post No. 40643262 identified a Discord server (“PokeJungle”) and two Discord  
13 usernames (“WolfenX” and “Pklk”) associated with the Strategy Guide leaks.

14           7. A review by the team of the PokeJungle Discord server led to another Discord  
15 server, “r/Pokemon” and a channel within r/Pokemon, #pokemon\_leaks.

16           8. Attached hereto as Exhibits 2–4 are true and correct copies of screenshots taken  
17 from the #pokemon\_leaks channel showing posts from users WolfenX#5356 and  
18 DimensioNz#3307.

19           9. Attached hereto as Exhibits 5–6 are true and correct copies of screenshots taken  
20 from the #pokemon\_leaks channel showing posts from user WolfenX#5356.

21           10. Multiple searches were performed to identify the individual behind the  
22 WolfenX#5356 user name. To date, those searches have not uncovered information leading to  
23 the identity of WolfenX#5356.

24           11. Searches were also performed to uncover the identity of DimensioNz#3307.  
25 Those searches identified DimensioNz#3307 as a man living in Milwaukee, Wisconsin.  
26

1 Attached hereto as Exhibit 7 is a true and correct copy of a screenshot of Dimensionz#3307's  
2 Discord profile.

3 12. Searches were also performed to uncover the identity of Uxinator#3307.  
4 Attached hereto as Exhibit 8 are true and correct copies of screenshots of Uxinator#3307's  
5 Discord profile and a Twitch account possibly belonging to Uxinator#3307.

6 13. Attached hereto as Exhibits 9–11 are the Exhibit As to the subpoenas that TPCi  
7 seeks permission to serve on Discord, 4chan and Dimensionz#3307.  
8

9 I declare under penalty of perjury under the laws of the United States that the foregoing is  
10 true and correct.  
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12 Executed at Seattle, Washington this 22nd day of November, 2019.

13 /s/ Holly M. Simpkins  
14 Holly M. Simpkins  
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